

1 **PATRICK W. KANG, ESQ.**

2 Nevada Bar No.: 10381

3 **KYLE R. TATUM, ESQ.**

4 Nevada Bar No.: 13264

5 **PAUL H. WOLFRAM, ESQ.**

6 Nevada Bar No.: 16025

7 **KANG & ASSOCIATES, PLLC**

8 6480 West Spring Mountain Road, Suite 1

9 Las Vegas, Nevada 89146

10 P: 702.333.4223

11 F: 702.507.1468

12 pkang@acelawgroup.com

13 filing@acelawgroup.com

14 *Attorneys for Plaintiffs*

15 **IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

16 FREDDY HWANG, an Individual; SAPPORO
17 GROUP NEVADA, INC., a Domestic
18 Corporation;

19 Case No.: 2:22-cv-00879-JCM-EJY

20 PLAINTIFFS,

21 v.

22 REDWOOD FIRE & CASUALTY
23 INSURANCE COMPANY, a Foreign
24 Corporation DOES 1 through 25, inclusive; and
25 ROE CORPORATIONS 1 through 25,
inclusive,

26 **STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES
(SECOND REQUEST)**

27 DEFENDANTS.

28 **STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES (SECOND
REQUEST)**

29 IT IS HEREBY STIPULATED by and between Plaintiffs, FREDDY HWANG, an
30 Individual, SAPPORO GROUP NEVADA, INC., a Domestic Corporation and Defendants,
31 REDWOOD FIRE & CASUALTY INSURANCE COMPANY, a Foreign Corporation, by their
32 respective counsel, pursuant to EDCR 2.35 as follows:

1 **Discovery Completed**

2 1. Plaintiff has tendered Initial Disclosures and multiple supplements thereto;

3 2. Plaintiff has served written discovery requests to Defendant including requests for

4 admissions, requests for production of documents, and interrogatories;

5 3. Defendant has tendered Initial Disclosures;

6 4. Defendant has served written discovery requests to Defendant including requests for

7 admissions, requests for production of documents, and interrogatories;

8 5. Plaintiff has responded to Defendant's written discovery requests;

9 6. Defendant has responded to Plaintiff's written discovery requests;

10 7. Plaintiff has provided his expert disclosures;

11 8. Defendant has provided its expert disclosures; and

12 9. Both parties have noticed the depositions of a number of witnesses and parties.

13

14 **Discovery to be Completed**

15 1. Deposition of the parties, including Defendant's FRCP 30(b)(6) Witness;

16 2. Depositions of any and all experts disclosed by the parties;

17 3. Depositions of additional fact witnesses; and

18 4. All other discovery that may become necessary as litigation continues.

19

20 **The Parties Have Agreed to Extend Discovery**

21 The parties have acted in good faith in attempting to comply with discovery deadlines. As

22 the parties have attempted to complete necessary discovery there have been some delays in

23 coordinating the depositions of a number of witnesses in order to accommodate the schedules of

24 the deponents and counsel. The parties are amicably working towards a resolution to ensure that

25 all depositions move forward in a manner that is satisfactory for all parties. Therefore, the parties

1 have agreed for a need to briefly extend the discovery deadlines in order to come to a resolution
 2 and accommodate the availability of the remaining depositions.

3 Therefore, the parties seek a 60-day extension in order to carry out remaining discovery.
 4 Counsel is in no way attempting to delay discovery in this matter, as they have been working to
 5 complete discovery in good faith.

6 **PROPOSED SCHEDULE OF DISCOVERY**

7 The parties hereby stipulate to continue the Discovery as follows:

	<u>Current Deadline</u>	<u>Proposed</u>
9 Discovery Deadline:	December 30, 2022	February 28, 2023
10 Dispositive Motions:	December 30, 2022	March 30, 2023
11 Joint Pre-Trial Order:	January 30, 2023	May 1, 2023

12 **Current Trial Date**

13 No trial dates have been set at this time.

15 Respectfully submitted, Approved as to Form and Content,

17 /s/Kyle R. Tatum, Esq.
 PATRICK W. KANG, ESQ.
 18 KYLE R. TATUM, ESQ.
 19 PAUL H. WOLFRAM, ESQ., ESQ.
 KANG & ASSOCIATES, PLLC
 20 Attorneys for Plaintiff
 FREDDY HWANG

/s/Michael W. Melendez, Esq.
 MICHAEL W. MELENDEZ, ESQ.
 COZEN O'CONNOR
 Attorneys for Defendant
 REDWOOD FIRE & CASUALTY
 INSURANCE COMPANY

23 **IT IS SO ORDERED.**

24 
 25 **US MAGISTRATE JUDGE**

26 **Dated: December 20, 2022**